

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SHELDON O'NEIL HARRIS-JACKSON :	CHAPTER 13
and LUCILLE STACY AMANDA :	
HARRIS-JACKSON :	
Debtors :	
:	
JACK N. ZAHAROPOULOS :	
STANDING CHAPTER 13 TRUSTEE :	
Movant :	
:	
vs. :	
:	
SHELDON O'NEIL HARRIS-JACKSON :	
and LUCILLE STACY AMANDA :	
HARRIS-JACKSON :	
Respondents :	CASE NO. 5-24-bk-00101

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 26th day of February, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' and for the following reason(s):

1. Trustee avers that debtors' plan cannot be administered due to the lack of the following:

- a. Pay stubs for the months of December 2023, January 2024 and February 2024 for Lucille Harris-Jackson.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos_____
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 27th day of February, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Timothy Fisher, II, Esquire
P.O. Box 396
Gouldsboro, PA 18424

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee